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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THOMAS CHRISTENSEN, E. BREEN
ARNTZ, AND GARY LEWIS
Plaintiffs.

vs.
UNITED AUTOMOBILE INSURANCE
COMPANY; LEWIS ROCA
ROTHGERBER CHRISTIE; DANIEL
POLSENBERG; J. CHRISTOPHER
JORGENSEN; ABRAHAM SMITH,
MATTHEW TSAI; WINNER &
SHERROD f/k/a ATKIN WINNER &
SHERROD; THOMAS E. WINNER;
ROGERS MASTRANGELO
CARVALHO & MITCHELL, LTD;
STEPHEN ROGERS; and DOES I
through V.

CASE NO: 2:22-cv-02125-JAD-KF

**JOINT MOTION AND ORDER
DEADLINES TO RESPOND TO MOTION
TO STRIKE(ECF NO. 65), MOTION TO
DISMISS OR QUASH SERVICE OF
SUMMONS (ECF NO. 66); AND MOTION
TO DISMISS (ECF NO. 67)**

FIRST REQUEST

[ECF No. 69]

Pursuant to Local Rules IA 6-1, 6-2 and LR 7-1, the undersigned parties and counsel of record, Thomas Christensen, Esq. of Christensen Law Offices, LLC on behalf of Plaintiffs, and Timothy J. Lepore, Esq. of Ropers Majeski PC on behalf of Defendants Rogers Mastrangelo Carvalho & Mitchell, Ltd. (“RMCM”) and Stephen Rogers, hereby jointly move to extend the time for filing of Responses and Replies to:

1) Defendants Stephen Rogers and Rogers Mastrangelo Carvalho & Mitchell, Ltd's Motion to Strike Plaintiffs' Amended Complaint (ECF 65); and

1 2 Defendants Stephen Rogers and Rogers Mastrangelo Carvalho & Mitchell, Ltd's Motion to
2 Dismiss or Quash Service of Summons and(ECF 66); and
3
4 3 Defendants Stephen Rogers and Rogers Mastrangelo Carvalho & Mitchell, Ltd's Motion to
5 Dismiss Plaintiffs' Amended Complaint and Joinder to Defendants' Rule 12(b)(6) Motion to
6 Dismiss Amended Complaint (ECF 67 .

7 This is the first request to extend time related to the pending Motions. These Motions were filed
8 on April 12, 2023 and pursuant to Local Rule 7-2, Plaintiffs' Responses are currently due April
9 26, 2023, and Rogers RMCM's replies to any responses are due on May 3, 2023. The Motions
10 are not scheduled for hearing, although the Court has set a hearing on June 15, 2023 to hear
11 argument on similar motions that other Defendants have filed (ECF 64.) The parties submit that,
12 to the extent the Court is willing to entertain any oral argument on these Motions, such argument
13 should be heard on June 15, 2023.

15 Plaintiffs submit good cause exists for the Court to grant the extended briefing schedule
16 because there are three pending Motions and scheduling issues prevented Plaintiffs' counsel from
17 having time to evaluate and file timely responses to each. Notably, a U.S. Supreme Court Petition
18 for Writ of Certiorari was submitted on April 19, 2023 and the Nevada Supreme Court held oral
19 argument on April 24, 2023---both regarding issues directly related to this case and these parties.
20 As Plaintiff's counsel is a very small firm, it was nearly impossible for it to spend additional time
21 on this case in the last two weeks and keep up with other obligations in the office.

23 Therefore, the parties hereto agree to stipulate to the following briefing schedule:
24
25 1. Plaintiff's Responses to the three pending Motions filed by Defendants Rogers and
26 RMCM will be filed on or before May 3, 2023;

1 2. Defendants Rogers and RMCM's Replies in support of their pending Motions will be
2
3 filed on or before May 17, 2023.
4

5 Dated this 26th day of April, 2023.
6

7 CHRISTENSEN LAW OFFICES, LLC
8 _____
9 /s/ *Thomas F. Christensen*

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16 ROPERS MAJESKI PC
17 _____
18 /s/ *Timothy J. Lepore*

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25 **ORDER**

26 IT IS SO ORDERED.
27

28 
29 _____
30 UNITED STATES DISTRICT COURT JUDGE

31 Dated: May 1, 2023